

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**OFFICE OF THE UNITED STATES  
TRUSTEE FOR REGION 7**

**Movant,**

**VS.**

**JACKSON WALKER, LLP**

**Respondent.**

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**CIVIL ACTION NO. 4:23-CV-04787**

**CHAPTER 7 TRUSTEE'S OBJECTION TO  
THE BANKRUPTCY COURT'S REPORT AND RECOMMENDATION THAT THE  
MOTION(S) TO WITHDRAW THE REFERENCE BE DENIED**

Randy W. Williams, Chapter 7 Trustee (hereinafter "Trustee") for the chapter 7 estate of Brilliant Energy, LLC, Case No. 21-30936 ("Brilliant"), pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, files this Chapter 7 Trustee's Objection to the Bankruptcy Court's Report and Recommendation that the Motions to Withdraw the Reference be Denied (found at docket #1), and in support thereof would respectfully show this Court as follows:

1. Trustee joins the United States Trustee's request, in the Motion at docket #2, that this Court withdraw the reference in the various subject bankruptcy cases and fee dispute matters (including all pretrial and discovery matters).
2. This Court should reject the recommendations of the Bankruptcy Court contained in the Report and Recommendations found at docket entry #1. The facts and circumstances underlying these bankruptcy cases (and various fee dispute matters), which preceded and led up to the resignation of (former) United States Bankruptcy Judge David R. Jones, has understandably caused the general public to question whether justice is being administered in a fair and impartial manner in the Southern

District of Texas. To now allow Judge Rodriguez, Judge Isgur, and Judge Lopez – all close (former) professional colleagues and friends of (former) Judge Jones – to sit in judgment on cases that center around their former colleague’s alleged misconduct and official conduct, only adds to the general public’s distrust that justice is being administered in a fair and impartial manner in the Southern District of Texas.

3. This Court should withdraw the reference (including all pretrial and discovery matters) in the pending fee dispute matters, and/or the various bankruptcy cases that are the subject of the United States Trustee’s Motion at docket #2, and the various bankruptcy cases which are presently included in Miscellaneous Proceeding 23-00645.
4. Chief Judge Crane’s assignment of this matter to a Judge from the Western District of Texas is consistent with the position that all judges of the Southern District of Texas, including the sitting U.S. Bankruptcy Court Judges, should not be sitting in judgment over matters related to former Judge Jones’ conduct.

WHEREFORE, PREMISES CONSIDERED, Randy W. Williams, Chapter 7 Trustee, respectfully prays that this Court reject the recommendations in the Bankruptcy Court’s Report and Recommendations at docket #1, and grant the United States Trustee’s Motion to Withdraw the Reference, found at docket #2, and for such other and further relief which is just.

Respectfully submitted,

/s/ Randy W. Williams  
Randy W. Williams  
SBN: 21566850  
7924 Broadway, Suite 104  
Pearland, TX 77581  
281-884-9269 Office Phone  
[rww@bymanlaw.com](mailto:rww@bymanlaw.com)  
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2024, a true and correct copy of this Objection was served upon the following parties by the method indicated and upon all parties registered to receive electronic notice via the Court's electronic filing system.

Via US Mail:

US TRUSTEE  
515 Rusk, Suite 3516  
Houston, TX 77002

Jason Lee Boland  
Norton Rose Fulbright US LLP  
1550 Lamar  
Suite 2000  
Houston, TX 77010

/s/ Randy W. Williams  
Randy W. Williams